

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA )  
v. )  
FRANK HAYDEN, DANIEL )  
HARRIMAN, FRANK NAPPO, RYAN )  
STOUDT, ARCHIE IGNACIO, )  
KATARINA GRUBLJESIC, )  
STRAHINJA GRUBLJESIC, and )  
ARVIND IYER, a/k/a S. ARAVINDAN, )  
Defendants. )  
No. 25-cr-  
)

**ORGANIZATIONAL VICTIM STATEMENT**  
Fed. R. Crim. P. 12(4)(b) and Local Criminal Rule 12.4.1(b)

The United States of America, by John J. McCormack, the Acting U.S. Attorney for the District of New Hampshire, and Alexander S. Chen, an Assistant U.S. Attorney, has identified at least 64 organizational victims in the above-captioned case. Pursuant to Fed. R. Crim. P. 12.4(b) and Local Criminal Rule 12.4.1(b), the Government identifies the following victims. The undersigned AUSA is unaware of persons controlling more than a 10% stake in them.

1. Ability Labs
  2. Adegna GmbH
  3. Alex Kruzel Telesto Strategy
  4. Antares Advisors
  5. Applied Marketing Science
  6. Black & Decker
  7. Bullseyers
  8. Chadwick Martin Bailey

9. Charter Communications
10. Customer Experience Italia Spa
11. David Lockwood Consulting
12. Ducker Carlisle
13. DXagency
14. Emerson Digital
15. FoodService IP
16. Forerunner Strategy
17. Four Winds Casino
18. FuelCycle
19. Fulcrum Consulting Group, LLC
20. GemSeek Consulting EOOD
21. Gojo LLC
22. Google
23. HarVeritas Consulting LLC
24. Ibotta
25. Kadence
26. Kodiak Cakes LLC
27. Lux Insights
28. Market Probe
29. Market Strategy Group
30. MarketVision
31. Marriner Marketing
32. Martec

33. Measuring U
34. Bill Atchinson Growth Ventures
35. NewtonX
36. Norseland
37. Northwell Health
38. Northwestern University
39. Old Salt
40. Osterman Research
41. Platform One
42. Potentiate USA
43. Professional Photographers of America
44. Rabin-Roberts Research
45. Radius
46. Research Partnership Ltd.
47. Sasha Auguste YUM Earth
48. Seattle Children's Hospital
49. Shift
50. Silicon Valley RG
51. Sparketing
52. SPMG Global
53. Stax
54. Sterling Rice Group
55. Talent Works
56. Technomic

57. Telesto Strategy
58. The Bernd Group
59. University of North Carolina – Chapel Hill
60. University of Maryland
61. Wake Forest
62. Wakefield Research
63. Xylem
64. YouMePHD

The United States has also identified the following 10 potential victims:

65. Cliff Kill Inc.
66. Incite New York, LLC
67. Jeremy Vandervoort Little Secrets, LLC
68. KT Tape
69. Lightspeed, LLC
70. Maple Hill Creamery LLC
71. Method Sync
72. Quinstreet
73. Reveal Research Studio
74. Sweet Lorens

Respectfully submitted,

JOHN J. MCCORMACK  
Acting United States Attorney

Dated: April 9, 2025

By: /s/ Alexander S. Chen  
Alexander S. Chen  
Assistant U.S. Attorney